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24 [Additional Counsel appear on signature page]

25 UNITED STATES DISTRICT COURT  
26 NORTHERN DISTRICT OF CALIFORNIA  
27 SAN FRANCISCO DIVISION

28 AUDLEY BARRINGTON LYON, JR., et. al.,

Plaintiffs,

v.

UNITED STATES IMMIGRATION AND  
CUSTOMS ENFORCEMENT, et. al.,

Defendants.

Case No. 13-cv-05878 EMC

**JOINT STIPULATION REGARDING  
SCHEDULE FOR J.H. DEPOSITION  
DESIGNATIONS; [PROPOSED]  
ORDER**

1 The parties respectfully submit this joint stipulation and proposed order concerning the  
 2 deadlines for the deposition designations for J.H., a member of the Plaintiff class who was  
 3 recently deported to the Philippines and is expected to be unavailable for trial. On March 17,  
 4 2016, the Court granted Plaintiffs' emergency request to depose J.H. to preserve his testimony,  
 5 given his then-impending deportation. *See* ECF No. 165; ECF No. 164. Pursuant to the Court's  
 6 order, the deposition of J.H. occurred on March 23, 2016, with questioning by counsel for both  
 7 Plaintiffs and Defendants. Plaintiffs requested expedited delivery of J.H.'s transcript, which was  
 8 delivered to all parties on March 29, 2016. Plaintiffs will submit J.H.'s deposition errata by no  
 9 later than April 4, 2016.

10 The trial in this case is schedule to being on May 23, 2016 and the Final Pretrial  
 11 Conference is scheduled for April 19, 2016. *See* ECF No. 96 (scheduling order); ECF No.107  
 12 (rescheduling Final Pretrial Conference to April 19, 2016). The Court's recent modification of  
 13 pretrial deadlines requires the joint pretrial conference statement to be filed by the Parties by  
 14 April 7, 2016. *See* No. 174. The Parties seek a slight modification of the pretrial deadlines with  
 15 respect to deposition designations for J.H., specifically:

16 April 8, 2016 – Parties to exchange deposition designations

17 April 13, 2016 – Parties to exchange any objections and counter-designations

18 April 15, 2016 – Parties to exchange responses to objections to designations and any  
 19 objections to counter-designations

20 April 18, 2016 – Plaintiffs to file the designations and objections  
 21 (by 9:00 a.m.)

22  
 23 Dated: April 1, 2016

By: /s/ Angélica Salceda  
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1 Dated: April 1, 2016

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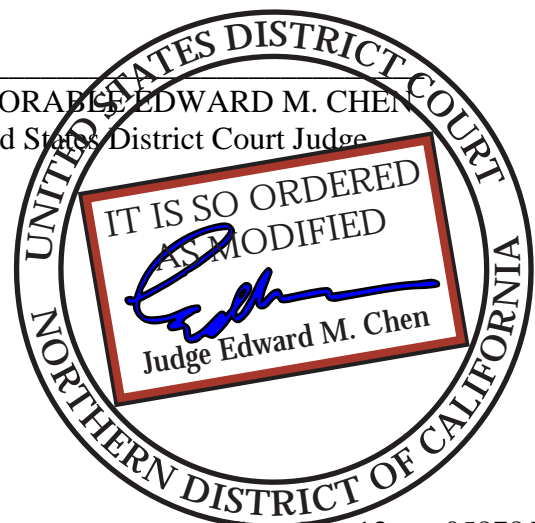
15 *Attorneys for Defendants*

16  
17  
18 **~~[PROPOSED]~~ ORDER**

19  
20 PURSUANT TO STIPULATION, IT IS SO ORDERED. (with modification on page 2 line  
21 21).

22 Date: 4/4/16

23 HONORABLE EDWARD M. CHEN  
24 United States District Court Judge



1                                   **ATTESTATION OF CONCURRENCE IN JOINT FILING**

2                                   **Pursuant to Local Rule 5-1(i)(3)**

3                   I, Angélica H. Salceda, hereby attest that the other signatories listed here have concurred  
4 in the filing of this document.

5  
6 Dated: April 1, 2016

/s/ Angélica H. Salceda  
ANGÉLICA H. SALCEDA

7  
8  
9  
10                                   **CERTIFICATE OF SERVICE**

11                                   No: 3:13-cv-05878 EMC

12                   I hereby certify that on April 1, 2016, a true and correct copy of the foregoing  
13 **Joint Stipulation Regarding Schedule for J.H. Deposition Designations** was served with the  
14 Clerk of the Court by using the CM/ECF system, which provided an electronic notice and  
15 electronic link of the same to all attorneys of record through the Court's CM'ECF system.

16  
17 Dated: April 1, 2016

/s/ Angélica H. Salceda  
ANGÉLICA H. SALCEDA